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**999 E Street, N.W.
Washington, D.C. 20463**

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MUR: 6916

DATE COMPLAINT FILED: 2/18/2015

DATES OF NOTIFICATION: 2/27/2015

3/2/2015

DATE OF LAST RESPONSE: 5/21/2015

DATE ACTIVATED: 6/24/2015

ELECTION CYCLE: 2006 through 2016

EARLIEST SOL: 7/29/2010¹

LATEST SOL: 10/31/2020

Foundation for Accountability and Civic Trust

Democratic National Committee, *et al.*²

52 U.S.C. § 30116³

52 U.S.C. § 30118

52 U.S.C. § 30119

52 U.S.C. § 30125

FEDERAL AGENCIES CHECKED: None

This matter concerns a complaint against the Democratic National Committee (“DNC”),

the Democratic Senatorial Campaign Committee (“DSCC”), the Democratic Congressional

Complainant alleges violations of the Act dating back to Catalyst's founding. Compl. at 18 (Feb. 18, 2015). Records from the Delaware Division of Corporations list Catalyst's date of formation as July 29, 2005.

² See Appendix A for the complete list of respondents. As indicated in the Appendix, the Commission received numerous responses in this matter. Many responses were filed on behalf of a single entity, while others were filed jointly on behalf of numerous respondents.

³ On September 1, 2014, the Federal Election Campaign Act of 1971, as amended (the "Act"), was transferred from Title 2 to new Title 52 of the United States Code.

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1 and the present. Thus, the allegation that Catalist provided its services to the Respondent
2 Committees at below-market rates applies to only a small subset of the Respondents. Regarding
3 that subset, sworn and specific information indicates that Catalist is a legitimate business with
4 both political and non-political clients, and that Catalist uses the same fixed criteria to set prices
5 for all of them. Thus, the available information is sufficiently persuasive to rebut the inferences
6 drawn in the Complaint.

7 As to the allegation that Catalist and NGP VAN⁸ served as "common vendors" between
8 Respondent Committees and other spenders, thus resulting in coordinated communications, there
9 is no information to suggest that either vendor provides services to "create, produce, or
10 distribute" communications, as required by the "common vendor" standard. Accordingly, this
11 allegation fails to satisfy the conduct prong of the Commission's coordination regulation.

12 Finally, the available information does not support the claim that the DNC established,
13 finances, maintains, or controls Catalist and thereby accepted soft money. Although Catalist's
14 founders and several known investors have ties to the DNC and Democratic causes, other
15 characteristics of their overall relationship indicate that the DNC did not establish and does not
16 finance, maintain, or control Catalist. Moreover, we have no information suggesting that the
17 funds Catalist receives are not provided in exchange for the goods and services it provides its
18 clients or as part of a legitimate business venture on the part of its investors.

19 Accordingly, we recommend that the Commission find: (1) no reason to believe
20 Respondents violated 52 U.S.C. §§ 30116, 30118, or 30119 by making or receiving excessive or
21 prohibited in-kind contributions in the form of discounted data and services; (2) no reason to
22 believe Respondent Committees violated 52 U.S.C. §§ 30116 or 30118 by receiving excessive or

⁸ Unlike Catalist, nearly all of the Respondents Committees used NGP VAN's software services. *See infra*
n. 39.

1 prohibited in-kind contributions in the form of communications coordinated through alleged
2 common vendors Catalist and NGP VAN; and (3) no reason to believe the DNC or Catalist
3 violated 52 U.S.C. § 30125 by soliciting, receiving, or directing funds that were not subject to
4 the prohibitions, limitations, and reporting requirements of the Act.

5 **II. FACTS**

6 **A. Catalist**

7 1. Description of Catalist's Business and Operations

8 Catalist is a limited liability company that "provide[s] progressive organizations with the
9 data and services needed to better identify, understand, and communicate with the people they
10 need to persuade and mobilize."⁹ According to its website, Catalist sells access to current data
11 on 280 million people, as well as web-based software and other data-mining tools that help
12 customers profile and target specific individuals.¹⁰ The company has a variety of clients,
13 including candidates, political committees, nonprofit organizations, colleges and universities,
14 and media outlets.¹¹ It is also a federal contractor, having received two awards from the
15 Government Accountability Office in 2014 totaling \$64,970.¹²

16 Harold Ickes and Laura Quinn founded Catalist in 2005. Both have ties to the
17 Democratic Party. Ickes served as White House Deputy Chief of Staff under President Clinton
18 and is a member of the DNC and the DNC's Rules and Bylaws Committee, while Quinn served

⁹ CATALIST, <http://www.catalist.us/about/about.html> (last visited Aug. 11, 2015).

¹⁰ *Id.*

¹¹ *Id.*; see also Catalist Resp. at 1 & n.1 (Apr. 9, 2015).

¹² Compl. at 19 & Ex. A.

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as Deputy Chief of Staff for Vice President Gore and consultant to various Democratic candidates and officeholders.¹³

According to Catalist, the company uses a subscription-based pricing model for its data sales.¹⁴ Under this model, clients pay a flat fee for year-long access to a particular "tier" of data and analytical tools.¹⁵ Catalist bases its prices on the tier a client selects and the geographic scope of the client's needs.¹⁶

Catalist has provided a sworn affidavit from Quinn certifying that the company uses this same pricing model for all clients.¹⁷ Quinn affirms that "Catalist provides services based on each customer's needs with a consistent market driven pricing schedule applied evenly to all customers. No favored deals are provided to any federal candidates or committees."¹⁸ This assertion is supported by the terms of at least one Respondent Committee's contract with Catalist. Specifically, Respondent Hillary Clinton for President ("HCFP") provided a copy of its 2007 Data License and Services Agreement with Catalist, which warrants that the terms of Catalist's service to HCFP were comparable to the terms available to Catalist's non-campaign clients and not intended to result in a contribution to the committee.¹⁹ The contract states:

¹³ Both Catalist and the DNC assert that the DNC did not authorize or play an active or significant role in establishing Catalist and does not have any authority to participate in or direct Catalist's operations. DNC Resp. at 4-5 & Ex. A (Declaration of Brad Marshall, *hereafter* "Marshall Declaration") (July 16, 2015). The DNC also notes that Ickes is 1 of 451 members of the DNC and 1 of 30 members of the Rules and Bylaws Committee. DNC Resp. at 5.

¹⁴ Catalist Resp. at 7 & Ex. A (Aff. of Laura Quinn, *hereafter* "Quinn Aff.").

¹⁵ *Id.*

¹⁶ *Id.*

¹⁷ Quinn Aff. ¶ 8; *see also* Catalist Resp. at 3 ("Catalist has a consistent, usual and normal pricing structure within which all contracts fall. . . . No favored deals are provided to any federal candidates or committees.").

¹⁸ Quinn Aff. ¶ 8.

¹⁹ HCFP Resp. at Ex. A (Apr. 14, 2015).

1 [Catalist's] performance of the Services, and the terms and conditions
2 contained herein, shall not knowingly be in violation of any applicable
3 laws, rules, or regulation, in that these terms and provisions would be
4 available to and required of non-campaign clients of Catalist and are no
5 more or less favorable than offered to non-campaign clients, if any.
6 Catalist intends to fully comply with all applicable Federal Election
7 Commission regulations and has examined and structured this
8 arrangement so as to prevent a contribution from resulting from either
9 (a) Catalist to Customer or (b) another customer of Catalist to Customer.²⁰

10 No other Respondents supplied copies of their contracts with Catalist.

11 The Complaint questions the pricing model, alleging that the resulting prices are below
12 the usual and normal charge for such goods. As support, the Complaint cites statements from the
13 2012 book, *The Victory Lab*, by reporter Sasha Issenberg, which chronicles the growing role of
14 statistical modeling in political campaigns.²¹ Issenberg writes that Catalist has "little interest in
15 profit," and "pay[s] attention to revenue but [is] more interested in keeping its prices down to
16 help partisan and ideological allies win elections."²² These statements are not attributed to any
17 source.

18 With the exception of HCFP, neither the Complainant nor the Respondents present
19 information about the specific rates that Catalist charged its clients or the other terms of their
20 contracts. However, the Commission's disclosure database shows that since 2010, only 15 of the
21 398 Respondent Committees reported disbursements to Catalist, ranging from the Monterey
22 County Democratic Central Committee Federal's disbursement of \$250 in 2012 to the DSCC's
23 total payment of \$247,750 in 2010. Below is a complete list of the Respondent Committees that
24 have reported disbursements to Catalist since 2010:

²⁰ *Id.* at 5 & Ex. A at 8.

²¹ SASHA ISSENBERG, *THE VICTORY LAB* (Crown Publishers, 2012) (*hereafter*, "THE VICTORY LAB");

²² *Id.* at 176, 179.

Respondent	Years Contracted	Amount(s) Paid to Catalyst ²³
DNC	2011	\$ 12,000.00
	2010	\$ 76,333.93
DSCC	2014	\$ 53,337.00
	2011	\$ 9,000.00
	2010	\$ 247,750.00
DCCC	2012	\$ 153,300.00
	2010	\$ 171,000.00
Committee to Elect Alan Grayson	2014	\$ 30,750.00
	2012	\$ 21,000.00
Garamendi for Congress	2012	\$ 3,040.00
Ami Bera for Congress	2012	\$ 500.00
Becerra for Congress	2012	\$ 13,668.50
Garamendi for Congress	2012	\$ 3,040.00
Texans for Henry Cuellar Congressional Committee	2010	\$ 1,019.71
Arizona State Democratic Central Executive Committee	2011	\$ 3,500.00
Democratic Executive Committee of Florida	2015	\$ 10,520.00
	2013	\$ 10,000.00
Monterey County Democratic Central Committee Federal	2012	\$ 250.00
Ohio Democratic Party	2012	\$ 21,000.00
	2010	\$ 9,950.00
Texas Democratic Party	2014	\$ 17,049.00
	2013	\$ 19,998.00
Vermont State Democratic Federal	2011	\$ 500.00
	2010	\$ 2,250.00

- 1 None of the remaining Respondent Committees have disclosed disbursements to Catalyst
- 2 since 2010, and, in fact, many Respondent Committees deny having ever contracted with

²³ FEC, CAMPAIGN FINANCE DISCLOSURE PORTAL, <http://www.fec.gov/pindex.shtml>. Additional Respondent Committees disclosed disbursements to Catalyst before 2010. For example, Hillary Clinton for President paid Catalyst \$370,525 in 2007; Obama for America paid Catalyst \$25,250 and \$50,250 in 2007 and 2008, respectively; and the DCCC reported an additional \$115,000 in disbursements to Catalyst in 2009.

1 Catalyst.²⁴ We have no information that suggests the Respondent Committees used Catalyst's
2 data services without a contract or payments to Catalyst.

3 In addition to the statements regarding Catalyst's motives, the Complaint alleges that
4 Catalyst uses investments from wealthy donors to keep costs low for political clients and
5 maintain a price structure that is below the usual and normal charge.²⁵ Catalyst acknowledges
6 that, in addition to its customer subscriptions, the company raises revenue through private
7 offerings.²⁶ By the end of 2006, the company initiated two private offerings for investors,²⁷ and
8 in 2013, it announced another major fundraising effort, with a lead investment of \$2.25 million
9 by billionaire George Soros.²⁸ In 2014, the Democracy Alliance, a network of supporters of
10 liberal causes and candidates, also appears to have encouraged its members to invest in
11 Catalyst.²⁹ Although we do not know what Soros and others may have received in return for their
12 investments, Catalyst asserts that "the provision of data and information services is a legitimate
13 business opportunity in the political arena and elsewhere."³⁰ In support of this claim, Catalyst
14 cites several news articles regarding the business opportunities associated with data brokering,

²⁴ See, e.g., Resp. of DCCC *et al.* at 2 (Apr. 27, 2015); Friends of Michelle Resp. (Apr. 12, 2015); Walsh for Mont. Resp. (Apr. 24, 2015); Morton for Congress Resp. (Apr. 24, 2015); Resp. of Adam Smith for Congress, *et al.* (Apr. 24, 2015).

²⁵ Compl. at 21-22.

²⁶ Catalyst Resp. at 2 & Quinn Aff. at 1; *see also* Compl. at 19, 21.

²⁷ Catalyst Resp. at 2.

²⁸ Press Release, Catalyst, Soros to Lead New Investment in Progressive Data Company Catalyst (Nov. 14, 2013), *available at* <http://www.catalist.us/news/news.html>.

²⁹ Compl. at Ex. B (DEMOCRACY ALLIANCE, SPRING 2014 INVESTMENT RECOMMENDATIONS at 17-18 (2014) (urging Democracy Alliance partners to provide "baseline support for Catalyst of at least \$500,000....")).

³⁰ Catalyst Resp. at 6-7.

1 including one article stating that data brokering is a \$300 billion-a-year industry.³¹ The company
2 also points to its nonpolitical customers, such as AOL, Pandora, Yahoo!, the Pew Charitable
3 Trusts, and many major educational institutions, to demonstrate that it is a legitimate data service
4 provider.³²

5 2. Data Sharing Between Catalist and Respondent Committees

6 The Complaint contends that, as part of their agreements with Catalist, Respondent
7 Committees share their internal voter files with the company on an ongoing basis. It asserts that
8 if a Catalist customer obtains new information about a voter — for example, from a voter
9 registration card it collects — Catalist receives that information in a regular “syncing” of the
10 customer’s list with Catalist’s servers.³³ This regular merging, the Complaint argues, folds
11 customers’ data into the Catalist database and makes the information immediately available to
12 other Catalist customers.³⁴ As an example, the Complaint quotes the following passage from *The*
13 *Victory Lab*, in which Issenberg provides an account of the relationship that President Obama’s
14 2008 campaign had with Catalist and NGP VAN:

15 Being one client among many in Catalist’s portfolio of progressive
16 institutions allowed the [Obama] campaign to create seamless links across
17 the activist left, including with outside groups with whom candidates were
18 legally prohibited from coordinating directly. When Democracia USA
19 collected a new voter’s registration form in Florida, Obama’s targeting
20 team often knew about it before the local board of elections. Democracia
21 would create a record in its databases, which synced daily with Catalist’s
22 servers. When the Obama campaign conducted its daily download from

³¹ *Id.* at 7 (citing Jason Morris and Ed Lavandera, *Why Big Companies Buy, Sell Your Data*, CNN.COM (Aug. 23, 2012), <http://www.cnn.com/2012/08/23/tech/web/big-data-axiom/>; Shefali Luthra, *Big Data Offer New Strategy For Public Health Campaigns*, KAISER HEALTH NEWS (Dec. 3, 2014), <http://khn.org/news/big-data-offer-new-strategy-for-public-health-campaigns/>).

³² Catalist Resp. at 3, 6-7 & n.2

³³ *Id.* (citing THE VICTORY LAB).

³⁴ *Id.*

1 Catalist's database, per its contract with the information vendor, the new
2 record would show up in the VAN. The campaign could start treating the
3 person as a voter — assigning model scores, canvassing her,
4 communicating by mail and phone, or getting her an absentee ballot —
5 even before the registration had been officially processed.³⁵

6 Issenberg does not identify sources for this account. Catalist disputes Issenberg's
7 account, stating that Catalist customers retain ownership of the data and information they provide
8 to Catalist, and that, pursuant to Catalist's Data Services and Licensing Agreement, Catalist
9 shares data between clients only pursuant to "legally sufficient written list exchange or purchase
10 agreement[s], executed by both exchanging parties."³⁶

11 **B. NGP VAN**

12 NGP VAN is a technology provider that primarily sells web-based software to facilitate
13 fundraising, compliance, field organizing, new media, and social networking.³⁷ According to its
14 website, NGP VAN's clients include "all the national Democratic committees, thousands of
15 Democratic campaigns, and hundreds of labor unions, progressive and non-partisan PACs, and
16 other organizations."³⁸ The Commission's disclosure data shows that all but 4 of the 398
17 Respondent Committees reported disbursements to NGP VAN between 2010 and the present.³⁹

18 The Complaint alleges that NGP VAN has "joined forces" with Catalist to "create a
19 seamless link across the activist left" to facilitate the sharing of customer data.⁴⁰ The implication
20 appears to be that Catalist customers use NGP VAN software to compile voter data and maintain

³⁵ THE VICTORY LAB at 299; *see also* Compl. at 22.

³⁶ Catalist Resp. at 8 & Quinn Aff. ¶ 10.

³⁷ ABOUT NGP VAN, <http://www.ngpvan.com/about> (last visited Sept. 2, 2015).

³⁸ *Id.*

³⁹ FEC, CAMPAIGN FINANCE DISCLOSURE PORTAL, <http://www.fec.gov/pindex.shtml>.

⁴⁰ Compl. at 22 (quoting THE VICTORY LAB at 299).

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1 internal lists, and a partnership between NGP VAN and Catalist allows the easy merging of
2 customer lists with the Catalist database.⁴¹

3 NGP VAN denies the allegation that it facilitates coordination.⁴² Press releases available
4 on both the NGP VAN and Catalist web sites show that the two companies have collaborated at
5 times.⁴³ However, we have no additional information on the extent of the relationship between
6 the two companies or the entities with which Catalist and NGP VAN may have allegedly
7 coordinated.

8 Two Respondent Committees supplied copies of their contracts with NGP VAN, one of
9 which appears relevant to this allegation.⁴⁴ Cooper for Congress Committee ("Cooper"), the
10 principal campaign committee of Rep. Jim Cooper (TN-05), provided a copy of a licensing
11 agreement for NGP VAN's "contribution web package," which gave Cooper access to NGP
12 VAN's web-based software for managing campaign data and filing campaign finance reports, as
13 well as a lease to use space on NGP VAN's servers.⁴⁵ Section 7(b) of the agreement provides
14 that "[a]ny data placed in the Software by Licensee and any data specific to Licensee e-mail list
15 or volunteer sign-ups or online contributions are the property of the Licensee and shall not be

⁴¹ *Id.*

⁴² NGP VAN Resp. at 1 (Apr. 12, 2015).

⁴³ In 2014, the two companies announced a partnership on a project called the "Activist Continuum," which used NGP VAN tools to better synthesize and organize the Catalist's data and analytics. Press Release, Catalist, NGPVAN and Catalist Partner on Innovative "Activist Continuum" Project for the National Education Association (Apr. 24, 2014), *available at* <http://www.catalist.us/news/news.html>.

⁴⁴ The other NGP VAN contract, submitted by Jeff Holmes for Congress, the principal campaign committee of an unsuccessful candidate for Michigan's Fourth District, was a contract for website design, and did not appear to involve the exchange of any voter data. *See* Jeff Holmes for Congress Resp. (Mar. 13, 2015).

⁴⁵ Cooper Resp. at 2-3 & Ex. 1 (Apr. 21, 2015).

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used by NGP VAN for any purpose other than in connection with the performance of this Agreement.”⁴⁶ We do not have any other agreements between the Respondents and NGP VAN.

C. Respondent Committees

The remaining 398 Respondents are party and authorized candidate committees that are alleged to have contracted with Catalist, NGP VAN, or both.⁴⁷ The list includes the DNC, the DSCC, the DCCC, 10 state party committees, and the authorized committees of 2 former presidential candidates, 43 Senate candidates, and 339 House candidates.

III. LEGAL ANALYSIS

A. Respondents Did Not Make or Receive Excessive or Prohibited Contributions in the Form of Goods Provided at Less Than the “Usual and Normal Charge”

The Act defines “contribution” as “any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office.”⁴⁸ Under the Commission’s regulations, the provision of any goods or services without charge or at a charge that is “less than the usual and normal charge” for such goods or services is a contribution.⁴⁹ The “usual and normal charge” for goods is “the price of those goods in the market from which they ordinarily would have been purchased at the time of the contribution.”⁵⁰ The “usual and normal charge” for non-volunteer services is “the hourly or piecework charge for the services at a commercially reasonable rate prevailing at the time the

⁴⁶ *Id.* at Ex. 1.

⁴⁷ As indicated above, 15 of the Respondent Committees appear to have contracted with Catalist between 2010 and the present, and 394 of the Respondent Committees appear to have contracted with NGP VAN during the same period.

⁴⁸ 52 U.S.C. § 30101(8)(A)(i).

⁴⁹ 11 C.F.R. § 100.52(d)(1).

⁵⁰ *Id.* at § 100.52(d)(2).

1 services were rendered.⁵¹ The Commission has previously opined that entities may establish the
2 "usual and normal charge" of goods or services by reference to the "fair market price" of goods
3 or services,⁵² "commercial considerations,"⁵³ or the fee provided to "similarly situated persons in
4 the general public."⁵⁴

5 Under the Act, a federal contractor may not make contributions to political parties or
6 candidates.⁵⁵ A limited liability company that is not a federal contractor may make contributions
7 to parties and candidates under certain circumstances,⁵⁶ but such contributions are subject to the
8 Act's limits.⁵⁷ Correspondingly, federal candidates, their authorized committees, and political
9 party committees may not knowingly accept a prohibited or excessive contribution.⁵⁸

⁵¹ *Id.*

⁵² See MUR 5682 (Bachmann for Congress) (finding that the respondent assigned an appropriate valuation to a mailing list where the respondent had consulted with a "reputable list broker" regarding the "proper fair market value" of the list); see also AO 2010-30 (Citizens United) ("Because the 'fair market price' is the price of the list in the market in which lists are ordinarily rented at the time of the rental, the 'fair market price' is the usual and normal charge for renting the list [of email contacts].").

⁵³ AO 2012-31 (AT&T) (opining that AT&T's proposed rate structure for text-message fundraising was not a contribution because, although rates would be lower than those AT&T usually charges to use its text message platform, the proposed rates would cover the company's costs as well as profit and would be offered on the same terms to all political customers).

⁵⁴ AO 2004-6 (Meetup) (concluding that a fee is usual and normal if the charge is "set in accordance with the fixed set of fee criteria" and "applied equally between the various classes of candidates...and other members of the general public who are similarly situated with respect to the respective classes of candidates and political committees."); see also AO 2014-09 (Reed Marketing).

⁵⁵ 52 U.S.C. § 30119(a); see also *Wagner v. FEC*, No. 1:11-cv-01841 (D.C. Cir. July 7, 2015) (en banc).

⁵⁶ 11 C.F.R. § 110.1(g)(2) (permitting limited liability companies to make contributions pursuant to 11 C.F.R. § 110.1(e) (regarding contributions by partnerships) when the limited liability company has elected to be treated as a partnership for IRS purposes and when the LLC has not made an election to be treated as either a partnership or a corporation). We do not know whether Catalist has elected to be treated as a partnership by the Internal Revenue Service.

⁵⁷ See 11 C.F.R. § 110.1(e).

⁵⁸ 52 U.S.C. §§ 30116, 30118, 30119.

1 According to the Complaint, Catalist has provided goods and services to the Respondent
2 Committees at rates below "the usual and normal charge" since 2006.⁵⁹ The Complaint does not
3 present any information about how much Catalist charges the Respondent Committees or the
4 extent to which those prices differed from prevailing market rates. Instead, the Complaint infers
5 that the Respondent Committees received discounted rates from statements in *The Victory Lab*
6 that Catalist lacked a profit motive and information showing that Catalist receives significant
7 investments from wealthy Democratic backers.⁶⁰

8 In contrast to the Complaint's general and inferential support, Respondents present
9 specific and sworn information to refute the allegation. According to Quinn and several of the
10 Respondent Committees that have contracted with Catalist, the respective contracts were arm's-
11 length commercial transactions, for which the Respondent Committees paid significant sums.⁶¹
12 Moreover, Quinn affirms that Catalist uses fixed criteria to determine how much it charges its
13 clients, and that these criteria are applied equally to similarly-situated political and non-political
14 clients.⁶² Other than the unattributed statements in *The Victory Lab*, we have no information

⁵⁹ Compl. at 20-21.

⁶⁰ See Part II.A.1.

⁶¹ Catalist Resp. at Quinn Aff. ¶ 9 ("All contracts are negotiated at arms [sic] length between Catalist and its customers."); Resp. of DCCC *et al.* at 2; HCFP Resp. at 4-5; Resp. of Democratic Exec. Comm. of Fla., *et al.* (Apr. 24, 2015); see also *supra* Part II.A.1.

⁶² Catalist Resp. at 6-7. This fact alone may suffice to show that Catalist's rates are "usual and normal." We currently lack information — such as the number of names or data points purchased by particular Respondent Committees — that would typically establish whether lists were purchased at market value. However, the Commission has previously opined that a vendor does not make a contribution to a political committee when the vendor uses fixed criteria to determine its price structure and applies those criteria equally to similarly-situated political and non-political clients. AO 2004-6 (Meetup). Here, the available information suggests that Catalist uses fixed criteria (namely, the types of data and analytics required and geographic scope of a contract) to determine its prices. The company claims to apply these criteria to all clients, whether political or not, a claim which is consistent with the terms of the 2007 HCFP-Catalist contract. See Part II.A.2. Admittedly, without details about the tiers and geographic areas selected by particular Respondent Committees or information about the rates Catalist offers to other similarly-situated clients, we cannot conclusively establish that Catalist's rates satisfy the *Meetup* standard; however, the company's sworn statements and the HCFP contract suggest that they do.

1 suggesting that Quinn's averments are not true. Further, Catalist has a long list of non-political
2 clients, including AOL, Pandora, Yahoo!, the Pew Charitable Trusts, major universities such as
3 Harvard, Stanford, Duke and Yale, and the federal government.⁶³ And although Catalist's
4 founders and prominent investors are noted Democratic supporters, the company has presented
5 information to show that data brokering in general — and Catalist in particular — is a legitimate
6 business that serves a wide range of clients and can produce significant profits and other
7 opportunities.⁶⁴ In light of this information, the Complaint's suggestion that investments in
8 Catalist were motivated by anything other than business considerations is speculative and
9 unsupported by the available facts.

10 Although no party presents clearly dispositive information to show that Catalist's rates
11 are usual and normal, Catalist's sworn affidavit and the information that the Respondent
12 Committees present are sufficiently persuasive to rebut the inferences the Complaint draws.⁶⁵
13 Purely speculative charges or charges based on unverifiable assertions are not considered
14 adequate grounds to proceed with an administrative inquiry, especially when rebutted by
15 contrary information.⁶⁶ Accordingly, we recommend that the Commission find no reason to
16 believe that Catalist or the Respondent Committees violated 52 U.S.C. §§ 30116, 30118, or
17 30119.

⁶³ Catalist Resp. at 2 & n.2.

⁶⁴ Catalist Resp. at 7; *see also supra* Part II.A.1.

⁶⁵ Factual and Legal Analysis at 6, MUR 5845 (Citizens for Truth) ("On balance, while the Responses do not delve into great detail to support their denials [of the allegation], the allegations in the complaint lack sufficient facts to warrant an investigation.").

⁶⁶ *Id.* at 5 ("[P]urported information from 'several anonymous sources on the campaign trail' . . . can and should be afforded no weight as no details are provided and there is no way to verify the information"); Statement of Reasons of Comm'rs Mason, Sandstrom, Smith, & Thomas at 1-2, MUR 4960 (Hillary Rodham Clinton for U.S. Senate Exploratory Comm.) ("[C]omplaints not based upon personal knowledge should identify a source of information that reasonably gives rise to a belief in the truth of the allegations presented.").

B. Respondent Committees Did Not Receive Excessive or Prohibited Contributions in the Form of Coordinated Communications Through Common Vendors

According to the Complaint, the Respondent Committees coordinated with unnamed third-party organizations on unspecified communications made between 2006 and the present by sharing strategic data through common vendors, Catalist and NGP VAN.⁶⁷ The Complaint alleges that these coordinated communications constitute excessive, prohibited, or unreported in-kind contributions from the third-party organizations to the Respondent Committees.⁶⁸

The Act considers any expenditure made by a person "in cooperation, consultation, or concert, with, or at the request or suggestion of, a candidate, authorized political committee, or a national or state party committee" to be an in-kind contribution.⁶⁹ These are considered "coordinated expenditures."⁷⁰ An expenditure for a communication is coordinated when the communication: (1) is paid for, in whole or part, by a person other than the candidate, committee, or party; (2) satisfies at least one of the content standards described in 11 C.F.R. § 109.21(c); and (3) satisfies at least one of the conduct standards described in 11 C.F.R. § 109.21(d).⁷¹

The Complaint generally alleges that the payment and content standards may be satisfied by the fact that non-campaign clients of Catalist and NGP VAN "spent upwards of \$100 million on public communications that advocate the election of Democrat [*sic*] candidates or defeat of

⁶⁷ Compl. at 25-26.

⁶⁸ *Id.*

⁶⁹ 52 U.S.C. § 30116(a)(7)(B)(i)-(ii); *see also* 11 C.F.R. §§ 109.20, 109.21(b).

⁷⁰ 11 C.F.R. § 109.20.

⁷¹ *Id.* § 109.21(a)(1)-(3).

1 Republicans" in the 2014 election cycle.⁷² It goes on to list a "sample" of Catalist and NGP
2 VAN clients that reported independent expenditures during the 2014 election cycle.⁷³ However,
3 the information before the Commission does not satisfy the conduct prong. The Complaint
4 argues that this case satisfies the conduct requirements because Catalist and NGP VAN acted as
5 "common vendors" between the Respondent Committees and the groups making the alleged
6 communications.⁷⁴ The "common vendor" standard is satisfied if all of the following are true:
7 (1) the person paying for the communication employs a commercial vendor⁷⁵ to "create, produce,
8 or distribute" the communication; (2) the vendor has provided certain delineated services to the
9 recipient of the contribution during the 120 days preceding the communication; and (3) the
10 vendor conveys non-public information about the campaign's "plans, projects, activities, or
11 needs," or services previously provided to the campaign by the vendor, and that information is
12 material to the creation, production, or distribution of the communication.⁷⁶

13 Here, the "common vendor" standard is not met because no information suggests that
14 either Catalist or NGP VAN provide services to "create, produce, or distribute" communications.
15 Catalist sells access to data files and analytical tools and clients may then, at their own

⁷² Compl. at 23 (citing a general search page on OpenSecrets.org permitting a user to search by "viewpoint" of the spender).

⁷³ *Id.* at 23. ("A sample of [Catalist's] soft-money outside groups include America Votes, EMILY's List, Ready for Hillary, AFL-CIO Workers' Voices, NARAL, League of Conservation Voters, Planned Parenthood, and SEIU's federal committee. [citation omitted] Combined with the reported independent expenditures of the DSCC and DCCC, these and other Catalist client outside groups spent over \$100 million in public communication s and other reportable 'independent expenditures' this cycle."); *see also id.* at 26 ("[O]utside groups, such as EMILY's List, have access to the Democratic political party and federal candidate client lists and voter data files through the 'seamless links across the activist left' created by Catalist.").

⁷⁴ *Id.* at 25-27.

⁷⁵ "Commercial vendor" means any persons providing goods or services to a candidate or political committee whose usual and normal business involves the sale, rental, lease or provision of those goods or services. 11 C.F.R. § 116.1(c).

⁷⁶ 11 C.F.R. § 109.21(d)(4)(i)-(iii).

1 discretion, use the selected data and tools to carry out campaign activities. Similarly, NGP VAN
2 sells licenses to use its software, which licensees may then use to carry out various campaign
3 activities. The available information does not indicate that either Catalist or NGP VAN help
4 clients select data or use selected data to achieve particular ends. Accordingly, neither Catalist
5 nor NGP VAN appears to be a commercial vendor employed to "create, produce, or distribute"
6 communications for their clients under the "common vendor" standard.⁷⁷ Because all three
7 factors must be satisfied in order to meet the definition of a "common vendor," it is unnecessary
8 to analyze the second or third factors.⁷⁸ And because the information before the Commission is
9 insufficient to satisfy the conduct prong, it is unnecessary to analyze the payment and content
10 prongs. Accordingly, we recommend that the Commission find no reason to believe Respondent
11 Committees violated 52 U.S.C. §§ 30116 or 30118 by receiving excessive or prohibited in-kind
12 contributions in the form of communications coordinated through alleged common vendors
13 Catalist and NGP VAN.

⁷⁷ 11 C.F.R. § 109.21(d)(4)(i); Coordinated and Independent Expenditures, 68 Fed. Reg. 421, 436 (Jan. 3, 2003) ("Thus, this standard only applies to a vendor whose usual and normal business includes the creation, production, or distribution of communications, and does not apply to the activities of persons who do not create, produce, or distribute communications as a commercial venture."); *see also* MUR 6077 (Norm Coleman) (finding that no coordination occurred where a vendor did not participate in creating, producing or distributing advertisements); MUR 6038 (Doug Lamborn, *et al.*) (dismissing as a matter of prosecutorial discretion allegations of coordination arising out of groups sharing voter lists through a vendor).

⁷⁸ Even if Catalist were to satisfy all three factors of the "common vendor" standard, the company appears to qualify for the firewall "safe harbor" of the coordination standard. *See* 11 C.F.R. § 109.21(h)(1)-(2). According to the regulations, the conduct prong of the coordination standard is not met if a vendor has established and implemented a written firewall policy that is designed and implemented to prohibit the flow of information between employees providing services for a person paying for a communication and the employees providing services to a candidate identified in the communication or his committee, an opponent, or a political party. *Id.* Catalist has supplied a copy of its firewall policy, which appears to meet the requirements of the safe harbor, *see* Catalist Resp. at 9 & Ex. B, and Complainant has presented no information suggesting that the firewall is insufficient or ineffective.

C. The DNC and Catalist Did Not Solicit, Receive, or Direct Soft Money

Finally, the Complaint alleges that the DNC established, finances, maintains, or controls Catalist and through Catalist has accepted contributions in violation of the soft money ban.⁷⁹ The Complaint specifically points to the investments that Catalist has received as examples of such contributions not subject to the limits and prohibitions of the Act.⁸⁰

As amended by the Bipartisan Campaign Reform Act ("BCRA"), the Act prohibits national party committees from soliciting, receiving, or directing another person to make a contribution, donation, or transfer of funds, or any other thing of value, that is not subject to the prohibitions, limitations, and reporting requirements of the Act.⁸¹ This "soft-money ban" also applies to entities that are directly or indirectly established, financed, maintained, or controlled by a national party committee.⁸² Ten non-exclusive factors (collectively, "EFMC factors") set out in 11 C.F.R. § 300.2(c)(2) determine whether a person or entity ("sponsor") "directly or indirectly established, financed, maintained or controlled" another person or entity under 52 U.S.C. § 30125. These factors must be examined in the context of the overall relationship between the sponsor and the entity to determine whether the presence of any factor or factors is evidence that the sponsor "directly or indirectly established, financed, maintained or controlled" the entity.⁸³

Here, the DNC and Catalist do not appear to have violated these provisions of the Act. The Complaint focuses on two EFMC factors that it believes demonstrate the relationship

⁷⁹ Compl. at 18.

⁸⁰ *Id.*

⁸¹ 52 U.S.C. § 30125; *see* 11 C.F.R. § 300.10(a).

⁸² 11 C.F.R. § 300.10(c)(2).

⁸³ *Id.*

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1 between the DNC and Catalist. First, the Complaint contends that Harold Ickes's overlapping
2 membership in Catalist and the DNC indicates a formal or ongoing relationship between the two
3 organizations.⁸⁴ Second, the Complaint argues that Ickes's role and the investments by
4 prominent Democratic donors demonstrate that the DNC had an active or significant role in the
5 formation of Catalist.⁸⁵

6 Although neither Catalist nor the DNC disputes that Ickes is a DNC member or that two
7 of Catalist's investors have also supported Democratic candidates and causes, the totality of
8 evidence does not support a finding that the DNC established, financed, maintained, or
9 controlled Catalist. As affirmed in the Quinn Affidavit, and the declaration of DNC CFO and
10 Custodian of Records, Brad Marshall, the DNC does not own any Catalist voting stock or
11 securities⁸⁶; have voting power or other decision-making authority over Catalist and does not
12 participate in its governance⁸⁷; have the authority or ability to hire, appoint, demote, or otherwise
13 control the officers, or other decision-making employees of Catalist⁸⁸; or provide funds or goods
14 to Catalist other than those it has paid for services rendered.⁸⁹ Moreover, even though Ickes is a
15 DNC member, he is only 1 of 451 DNC members, and 1 of 30 members of the DNC's Rules and
16 Bylaws Committee, and the mere involvement of one DNC member in Catalist, a private
17 venture, does not establish that Catalist is controlled by the DNC or acts at its behest.

⁸⁴ *Id.* at § 300.2(c)(2)(iv).

⁸⁵ *Id.* at § 300.2(c)(2)(ix).

⁸⁶ Catalist Resp. at Ex. A; DNC Resp. at Ex. A; *see* 11 C.F.R. § 300.2(c)(2)(i).

⁸⁷ Catalist Resp. at Ex. A; DNC Resp. at Ex. A; *see* 11 C.F.R. § 300.2(c)(2)(ii).

⁸⁸ Catalist Resp. at Ex. A; DNC Resp. at Ex. A; *see* 11 C.F.R. § 300.2(c)(2)(iii).

⁸⁹ Catalist Resp. at Ex. A; DNC Resp. at Ex. A; *see* 11 C.F.R. § 300.2(c)(2)(vii)-(viii).

Moreover, even if the Commission were to assume that the DNC established Catalist, a violation of section 30125 exists only if the DNC or Catalist accepted contributions, donations, or transfers of funds, or any other thing of value that is not subject to the Act's source and amount limitations.⁹⁰ We are aware of no information, however, that suggests that any funds Catalist receives are not provided in exchange for the goods and services it provides its clients or as part of a legitimate business venture on the part of its investors, as Catalist contends. Accordingly, we recommend that the Commission find no reason to believe that Catalist and the DNC violated 52 U.S.C. § 30125 by soliciting, receiving, or directing contributions, donations, transfers of funds, or any other thing of value, that is not subject to the prohibitions, limitations, and reporting requirements of the Act.

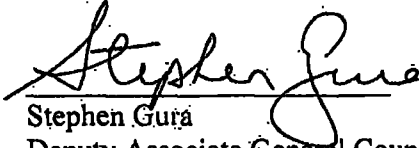
IV. RECOMMENDATIONS


1. Find no reason to believe that Catalist and the Respondent Committees violated 52 U.S.C. §§ 30116, 30118, or 30119 by making or receiving prohibited in-kind contributions in the form of data and analytical tools.
2. Find no reason to believe that Catalist, NGP VAN, and the Respondent Committees violated 52 U.S.C. §§ 30116 or 30118 by making or receiving prohibited or excessive in-kind contributions in the form of coordinated communications.
3. Find no reason to believe that Catalist or the DNC violated 52 U.S.C. § 30125 by soliciting, receiving, or directing funds that were not subject to the prohibitions, limitations, and reporting requirements of the Act.
4. Approve the attached Factual and Legal Analysis.
5. Approve the appropriate letters.
6. Close the file.

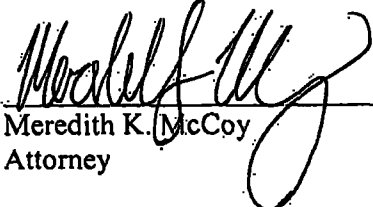
⁹⁰ 52 U.S.C. § 30125; *see* 11 C.F.R. § 300.10(a)(1).

10.21.15
Date

Kathleen Guith
Acting Associate General Counsel for
Enforcement


Stephen Gura
Deputy Associate General Counsel for
Enforcement


Peter G. Blumberg
Assistant General Counsel


Meredith K. McCoy
Attorney

10-00000000-10

SENSITIVE

**FEDERAL ELECTION COMMISSION
FIRST GENERAL COUNSEL'S REPORT
APPENDIX A**

RESPONDENTS:*

Democratic National Committee and Andrew Tobias in his official capacity as treasurer

Democratic Senatorial Campaign Committee and Deanna Nesburg in her official capacity as treasurer[†]

Democratic Congressional Campaign Committee and Kelly C. Ward in her official capacity as treasurer[†]

Catalist, LLC

NGP VAN, LLC

State & Local Party Committee Respondents:

Arizona State Democratic Central Executive Committee and Rick McGuire in his official capacity as treasurer

Democratic Executive Committee of Florida and Judy Mount in her official capacity as treasurer[‡]

* The following Respondent Committees did not file a response to the Complaint: Adam Clayton Powell for Congress, Arizona State Democratic Central Executive Committee, Battle for Congress, Beale for Congress, Bonnie Watson Coleman for Congress, Citizens for Boyle, Clarke for Congress, Clay Aiken for North Carolina, Committee to Elect Alan Grayson, Committee to Elect Keith Ruehl, Committee to Elect Paul Clements, Connie Johnson for Oklahoma, Crisco for Congress, Denney for Congress, Dilan for New York, Dutch Ruppersberger for Congress, Espaillat for Congress, Espero for Congress, Friends of Alexandra, Friends of Amy Tavio, Friends of Curtis C. Osborne, Friends of Forrest Dunbar, Friends of Joe Baca 2014, Friends of Raj Kittappa, Friends of Terry Adams, Friends of Roy Cho Inc., Friends of Wesley Reed, Gallardo for Congress, Gutierrez for Congress, Headrick for Congress, Hughes for Congress, Jackie Speier for Congress, James Mitchell for Congress, Janice Kovach for Congress, Kanuth for Congress, Kelly Westlund for Congress, Louie Minor for Congress, Marcus Brandon for Congress, Marianne Williamson for Congress, Mark Levine for Congress, Inc., Mary Ellen Balchunis for Congress, Matt for Oklahoma, Matt Miller for Congress 2014, McNeerney for Congress, Monterey County Democratic Central Committee Federal, Moore for Congress, Mowrer for Iowa, Nels Mitchell for Idaho, New Jersey Democratic State Committee, People for Rick Weiland, Peterson for Congress, Richard Bolger for Congress, Ron Leach for Congress Campaign, Rudy Hobbs for Congress, Schwartz for Congress, Scott for Congress, Sharon Sund for Congress, Sheila Oliver for U.S. Senate, Skinner for Congress '14, Susan Grettenberger for Congress, Taylor for US Senate, The Niki Tsongas Committee, Tony Cardenas for Congress, Trammell for Congress, Trivedi for Congress, Troy Jackson for Congress, Vincent Gregory for Congress, Visclosky for Congress, Wes Neuman for Congress.

[†] Respondents denoted by this symbol submitted a joint response.

[‡] Respondents denoted by this symbol submitted a joint response.

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Maine Democratic State Committee and Betty Johnson in her official capacity as treasurer[§]

Mississippi Democratic Party PAC and Ryan Brown in his official capacity as treasurer[§]

Monterey County Democratic Central Committee Federal and Thomas Montgomery in his official capacity as treasurer

New Jersey Democratic State Committee and Kelly Stewart Maer in her official capacity as treasurer

Democratic Party of New Mexico and Robert Lara in his official capacity as treasurer

Ohio Democratic Party and Fran Alberty in her official capacity as treasurer[§]

Tennessee Democratic Party and Wade Munday in his official capacity as treasurer[§]

Texas Democratic Party and Gilberto Hinojosa in his official capacity as treasurer[§]

Vermont State Democratic Committee Federal Account and James Ashley in his official capacity as treasurer[§]

Authorized Committee Respondents: A Whole Lot of People for Grijalva Congressional Committee and Maya Castillo in her official capacity as treasurer[†]

Aaron Woolf for Congress and Sue Montgomery Corey in her official capacity as treasurer[†]

Adam Clayton Powell for Congress and Mark Jay Weinstein in his official capacity as treasurer

Adam Smith for Congress Committee and Jay Petterson in his official capacity as treasurer

[§] Respondents denoted by this symbol submitted a joint response.

^{**} Respondents denoted by this symbol submitted a joint response.

1 Aimée Belgard for Congress and Sander Friedman
2 in his official capacity as treasurer†

3 Al Franken for Senate 2014 and Thomas H. Borman
4 in his official capacity as treasurer†

5 Alaskans for Begich 2014 and Connie Sanders in
6 her official capacity as treasurer†

7 Alex Sink for Congress and Jennifer May in her
8 official capacity as treasurer†

9 Alison for Kentucky and Robert C. Stilz III in his
10 official capacity as treasurer†

11 Amanda Curtis for Senate and Mary Sexton in her
12 official capacity as treasurer†

13 Americans for Gabriel Rothblatt and Taj Alice
14 Jones Rothblatt in her official capacity as treasurer†

15 Ami Bera for Congress and Jennifer May in her
16 official capacity as treasurer

17 Andre Carson for Congress and Timothy J.
18 Moriarty in his official capacity as treasurer

19 Anesa for Iowa and Eric Bearbower in his official
20 capacity as treasurer

21 Ann Callis for Congress and Jennifer May in her
22 official capacity as treasurer†

23 Appel for Iowa, Inc. and Sally Pedersen in her
24 official capacity as treasurer†

25 Barbara Lee for Congress and Loraine Binion in her
26 official capacity as treasurer

27 Barbara Mulvaney for Congress and Jana Mulvaney
28 in her official capacity as treasurer

29 Battle for Congress and Gil Baird in his official
30 capacity as treasurer

31 Beale for Congress and Steven R. Burris in his
32 official capacity as treasurer

1 Beatty for Congress and Jeffrey A. Ruppert in his
2 official capacity as treasurer†

3 Becerra for Congress and Robert Herrera in his
4 official capacity as treasurer†

5 Bellows for Senate and Daniel Hildreth in his
6 official capacity as treasurer†

7 Ben Nelson 2012 and Jessica Lathrop in her official
8 capacity as treasurer†

9 Beto O'Rourke for Congress Committee and
10 Susannah Byrd in her official capacity as treasurer†

11 Bill Foster for Congress and Aesook Byon in his
12 official capacity as treasurer†

13 Blumenauer for Congress and Henry Hewitt in his
14 official capacity as treasurer†

15 Bobby for Michigan and Daniel Pydyn in his
16 official capacity as treasurer†

17 Bock for Congress and Steven Goldberg in his
18 official capacity as treasurer

19 Bonamici for Congress and Elise Greene in her
20 official capacity as treasurer†

21 Bonnie Watson Coleman for Congress and Donna
22 Genges Watson in her official capacity as treasurer

23 Brad Ashford for Congress and Frank Barrett in his
24 official capacity as treasurer†

25 Braley for Iowa and Theresa L. Kehoe in her
26 official capacity as treasurer†

27 Brenda Lawrence for Congress and Lindsay
28 Angerholzer in her official capacity as treasurer†

29 Brian Higgins for Congress and Gary Kanaley in his
30 official capacity as treasurer†

31 Bruce Davis for Congress and Glenda Denise Clark
32 in her official capacity as treasurer

1 Bruce Elder for Congress and Larry Hoover in his
2 official capacity as treasurer

3 Butterfield for Congress and Scott R. Falmlen in his
4 official capacity as treasurer†

5 Cain for Congress and Jeremy Fischer in his official
6 capacity as treasurer**

7 Cannon for Congress and Jennifer May in her
8 official capacity as treasurer†

9 Carl Sciortino Committee and Francis Pemberton
10 Brown in her official capacity as treasurer†

11 Carol Shea-Porter for Congress and Mary
12 Dimodica-Kulju in her official capacity as treasurer†

13 Cartwright for Congress and Jennifer May in her
14 official capacity as treasurer†

15 Castor for Congress and Amy Diamond in her
16 official capacity as treasurer†

17 Castro for Congress and Jose H. Villarcal in his
18 official capacity as treasurer

19 Childers for Senate Inc. and Marilyn Jones in her
20 official capacity as treasurer†

21 Chris Coons for Delaware and Judith Zamore in her
22 official capacity as treasurer†

23 Cicilline Committee and Nancy L. Benoit in her
24 official capacity as treasurer†

25 Citizens for Boyle and Lindsay Angerholzer in her
26 official capacity as treasurer

27 Citizens for Michael Wager and Peggy Gries Wager
28 in her official capacity as treasurer†

29 Clarke for Congress and Ray L. Trotman in his
30 official capacity as treasurer†

31 Clay Aiken for North Carolina and Eugene Conti in
32 his official capacity as treasurer

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1 Cohn for Congress and Bob Friedman in his official
2 capacity as treasurer†

3 Cole for Congress and Nicholas Finc in his official
4 capacity as treasurer†

5 Committee to Elect Alan Grayson and Dustin
6 Andersen in his official capacity as treasurer

7 Committee to Elect Abel J Tapia and Keith
8 Carpenter in his official capacity as treasurer

9 Committee to Elect Gary L. Ackerman, Inc. and
10 Robert Barnett in his official capacity as treasurer†

11 Committee to Elect Keith Ruehl and Anthony
12 Joseph Delmonte in his official capacity as treasurer

13 Committee to Elect Leslie to Congress and Judy
14 Pingel in her official capacity as treasurer†

15 Committee to Elect Martha Robertson Enid Littman
16 in her official capacity as treasurer†

17 Committee to Elect Paul Clements and Allen Webb
18 in his official capacity as treasurer

19 Committee to Re-Elect Henry "Hank" Johnson and
20 Malcolm A. Cunningham in his official capacity as
21 treasurer†

22 Committee to Re-Elect Linda Sanchez and Jennifer
23 May in her official capacity as treasurer

24 Committee to Re-Elect Loretta Sanchez and
25 Katharine Meyer Borst in her official capacity as
26 treasurer†

27 Committee to Re-Elect Nydia M. Velazquez and
28 Betty Diana Arce in her official capacity as
29 treasurer†

30 Connie Johnson for Oklahoma and Linda J.
31 Huggins in her official capacity as treasurer

32 Connolly for Congress and John Jennison in his
33 official capacity as treasurer†

1 Cooper for Congress and Robert A. Davidson in his
2 official capacity as treasurer

3 Corry Westbrook for Congress and Catherine E.
4 Wenzling in her official capacity as treasurer†

5 Cory Booker for Senate and Scott Kobler in his
6 official capacity as treasurer

7 Courtney for Congress and Tim Poloski in his
8 official capacity as treasurer†

9 Crisco for Congress and Keith Crisco in his official
10 capacity as treasurer

11 Crowley for Congress and Scott G. Kaufman in his
12 official capacity as treasurer†

13 Dan Lipinski for Congress and Jerome R. Hurckes
14 in his official capacity as treasurer

15 David M. Alameel for United States Senate and
16 David Pulling in his official capacity as treasurer

17 Daylin for Congress and Christopher Massicotte in
18 his official capacity as treasurer

19 Debbie Dingell for Congress and Martha Darling in
20 her official capacity as treasurer†

21 Debbie Wasserman Schultz for Congress and
22 Lawrence Wasserman in his official capacity as
23 treasurer†

24 Defazio for Congress and Jef A. Green in his
25 official capacity as treasurer†

26 Delbene for Congress and Jay Petterson in his
27 official capacity as treasurer†

28 Denney for Congress and Wayne Harrison in his
29 official capacity as treasurer

30 Denny Heck for Congress and Jay Petterson in his
31 official capacity as treasurer**

32 Diana Degette for Congress and Edgar Neel in his
33 official capacity as treasurer†

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1 Dilan for New York and Christian Espinal in his
2 official capacity as treasurer

3 Doggett for Congress and James E. Cousar in his
4 official capacity as treasurer†

5 Domina for Nebraska Inc. and Fred A. Lockwood in
6 his official capacity as treasurer†

7 Donald M. Payne Jr. for Congress and H. O'Neil
8 Williams in his official capacity as treasurer†

9 Donna Edwards for Congress and Janice Edwards
10 in her official capacity as treasurer†

11 Dr. Raul Ruiz for Congress and John Pinkney in his
12 official capacity as treasurer†

13 Duckworth for Congress and Keith D. Lowey in his
14 official capacity as treasurer†

15 Dutch Ruppersberger for Congress and David C.
16 Deger in his official capacity as treasurer

17 Ebbin for Congress and Patsy Ticer in her official
18 capacity as treasurer†

19 Ed Jany for Congress and Jennifer May in her
20 official capacity as treasurer†

21 Eggman for Congress 2014 and Jay Petterson in his
22 official capacity as treasurer**

23 Ehrlich for Congress and Kirsten L. Koester in her
24 official capacity as treasurer†

25 Elect April Freeman and Betty Kostrach in her
26 official capacity as treasurer

27 Elisabeth Jensen for Congress and Laura Anne
28 D'Angelo in her official capacity as treasurer**

29 Elizabeth Colbert Busch for Congress and Claus
30 Busch in his official capacity as treasurer†

31 Ellison for Congress and Carla Kjellberg in her
32 official capacity as treasurer†

1 Eloise Gómez Reyes for Congress and William P.
2 Smith in his official capacity as treasurer†
3
4 Enyart for Congress and Brent M. Gaines in his
5 official capacity as treasurer†
6
7 Erin Bilbray for Congress and William Stanley in
8 his official capacity as treasurer†
9
10 Erin McClelland for Congress and Douglas
11 Campbell in his official capacity as treasurer†
12
13 Espallat for Congress and Rafael Lantigua in his
14 official capacity as treasurer
15
16 Espero for Congress and Bryan Gallarde in his
17 official capacity as treasurer
18
19 Euille for Congress and Lynnwood G. Campbell in
20 his official capacity as treasurer†
21
22 Fattah for Congress and Roger J. Jackson, Jr. in his
23 official capacity as treasurer†
24
25 Fausz for Congress and Jonathan Wheeler in his
26 official capacity as treasurer†
27
28 Festersen for Congress and Mike Abramson in his
29 official capacity as treasurer
30
31 Filemon Vela for Congress and Mary Jo Vela in her
32 official capacity as treasurer**
33
34 Fred Kandrata for Congress Committee and
35 William M. Bristol in his official capacity as
36 treasurer
37
38 Frederica S. Wilson for Congress and Larry
39 Handfield in his official capacity as treasurer†
40
41 Friends for Gregory Meeks and Patsy A. Simmons
42 in her official capacity as treasurer†
43
44 Friends for Jim McDermott and Philip Lloyd in his
45 official capacity as treasurer**
46
47 Friends of Alexandra and Alexandra Eidenberg in
48 her official capacity as treasurer

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1 Friends of Amy Tavio and Sarah Hyder in her
2 official capacity as treasurer

3 Friends of Bill Tilghman and Christian D. Tilghman
4 in his official capacity as treasurer

5 Friends of Cheri Bustos and Jeanette Hunter in her
6 official capacity as treasurer†

7 Friends of Corrine Brown and Gloria Simmons in
8 her official capacity as treasurer†

9 Friends of Curtis C. Osborne and Christopher
10 Eugene Carter in his official capacity as treasurer

11 Friends of Dan Kildee and Jeff Tippet in his
12 official capacity as treasurer†

13 Friends of Dan Maffei and Herbert Millane in his
14 official capacity as treasurer†

15 Friends of Dick Durbin and Anne Dougherty in her
16 official capacity as treasurer†

17 Friends of Don Beyer and Mary Margaret Whipple
18 in her official capacity as treasurer†

19 Friends of Elizabeth Esty and Patti Flynn-Harris in
20 her official capacity as treasurer**

21 Friends of Estakio and Jay Petterson in his official
22 capacity as treasurer**

23 Friends of Farr and Sidney Slade in her official
24 capacity as treasurer†

25 Friends of Forrest Dunbar and Joe Samaniego in his
26 official capacity as treasurer

27 Friends of Houghton for Congress and Gregory
28 Paulson in his official capacity as treasurer

29 Friends of Jared Polis Committee and Edith R.
30 Hooton in her official capacity as treasurer**

31 Friends of Joe Baca 2014 and Joe Baca in his
32 official capacity as treasurer

1 Friends of John Barrow and Tom Bordeaux in his
2 official capacity as treasurer†

3 Friends of John Delaney and April McClain
4 Delaney in her official capacity as treasurer†

5 Friends of John Sarbanes and Meghan Stumpf in
6 her official capacity as treasurer†

7 Friends of Lois Capps and Andrew Siegel in his
8 official capacity as treasurer†

9 Friends of Mark Sickles and Charles R. Chambers,
10 Jr. in his official capacity as treasurer†

11 Friends of Mark Warner and Gerald S. McGowan in
12 his official capacity as treasurer†

13 Friends of Mary Landrieu, Inc. and Nancy
14 Marsiglia in her official capacity as treasurer†

15 Friends of Michelle and Deborah A. Armstrong in
16 her official capacity as treasurer

17 Friends of Patrick Murphy and Brian Foucart in his
18 official capacity as treasurer†

19 Friends of Pete Gallego and Anthony Gutierrez in
20 his official capacity as treasurer†

21 Friends of Raj Kittappa and Jesse Fluck in his
22 official capacity as treasurer

23 Friends of Renteria and Jay Petterson in his official
24 capacity as treasurer†

25 Friends of Rosa Delauro and Patrick Charmel in his
26 official capacity as treasurer†

27 Friends of Roy Cho Inc. and Diane Wexler in her
28 official capacity as treasurer

29 Friends of Shaughnessy Naughton and Erinn Larkin
30 in her official capacity as treasurer†

31 Friends of Tate Macqueen and Lori Murphy in her
32 official capacity as treasurer†

1	Friends of Terry Adams and Robert D. Tuke in his
2	official capacity as treasurer
3	Friends of Val Arkoosh and Margaret Sager in her
4	official capacity as treasurer†
5	Friends of Warren Christopher and Leticia Carroll
6	Smith in her official capacity as treasurer
7	Friends of Wesley Reed and Teresa Klein in her
8	official capacity as treasurer
9	Fry for Congress and Peggy Stalder in her official
10	capacity as treasurer
11	Gallardo for Congress and Steve M. Gallardo in his
12	official capacity as treasurer
13	Gallego for Arizona and Rebecca Wininger in her
14	official capacity as treasurer†
15	Garamendi for Congress and Janica Kyriacopoulos
16	in her official capacity as treasurer†
17	Gaughan for Congress and Lawrence Denis
18	Gaughan in her official capacity as treasurer
19	Glen Gainer for Congress and Jennifer May in her
20	official capacity as treasurer†
21	Gloria Bromell Tinubu for Congress and Donald L.
22	Fowler in his official capacity as treasurer†
23	Greenstein for Congress and Jennifer May in her
24	official capacity as treasurer†
25	Gutierrez for Congress and Soraida Gutierrez in her
26	official capacity as treasurer
27	Hagan for US Senate Inc. and Dwight M. Davidson
28	III in his official capacity as treasurer†
29	Halter for Congress and Richard Klumpp in his
30	official capacity as treasurer
31	Halvorson for Congress and Jim Bush in his official
32	capacity as treasurer

1 Hanabusa for Hawaii and George S. Yamamoto in
2 his official capacity as treasurer

3 Hansen Clarke for Congress and Choi Palms-Cohen
4 in her official capacity as treasurer†

5 Harris for Wisconsin and Susan E. Harris in her
6 official capacity as treasurer

7 Headrick for Congress and Sunny Jewel Murray in
8 her official capacity as treasurer

9 Herring for Congress and Shaunica Pridgen in her
10 official capacity as treasurer

11 Hillary Clinton for President and Shelly R. Moskwa
12 in her official capacity as treasurer

13 Himes for Congress and Kathleen Digennaro
14 Warner in her official capacity as treasurer†

15 Hodges for Congress and Cynthia Nowell in her
16 official capacity as treasurer

17 Hope for Congress and Elizabeth L. Wildhack in
18 her official capacity as treasurer†

19 Horsford for Congress and Piper Overstreet in her
20 official capacity as treasurer†

21 Houston Barnes for Congress Committee and Brice
22 Barnes in his official capacity as treasurer

23 Hoyer for Congress and Amy Pritchard in her
24 official capacity as treasurer†

25 Huffman for Congress 2014 and Stacy E. Owens in
26 her official capacity as treasurer†

27 Hughes for Congress and Mark A. Fiore in his
28 official capacity as treasurer

29 Hutto for US Senate and Rebekah F. Durr in her
30 official capacity as treasurer

31 Ikaika for Hawaii and Stacey Edralin in her official
32 capacity as treasurer†

2025 RELEASE UNDER E.O. 14176

1 Jackie McPherson for Congress and Mary Anne
2 Salmon in her official capacity as treasurer

3 Jackie Speier for Congress and Russell Miller in his
4 official capacity as treasurer

5 James Lee Witt for Congress and Bob Nash in his
6 official capacity as treasurer

7 James Mitchell for Congress and Ronnie Devine in
8 his official capacity as treasurer

9 Janice Hahn for Congress and James Cross official
10 capacity as treasurer†

11 Janice Kovach for Congress and Peter D. Nichols in
12 his official capacity as treasurer

13 Janis Kent Percefull for Congress and Faith
14 Samantha Sherman in her official capacity as
15 treasurer

16 Jeff Holmes for Congress and Greg S. Mapes in his
17 official capacity as treasurer

18 Jeff Merkley for Oregon and Elise Greene in her
19 official capacity as treasurer†

20 Jeffries for Congress and Lennie H. Singletary III in
21 his official capacity as treasurer

22 Jennifer Garrison for Congress and Russell Garrison
23 in his official capacity as treasurer

24 Jessica McCall for Congress and Emerson
25 Merckerson in his official capacity as treasurer

26 Jim Graves for Congress and Peter Donohue in his
27 official capacity as treasurer

28 Jim Read for Congress and Christi Siver in her
29 official capacity as treasurer

30 Joanne Dowdell for Congress and Joanne Dowdell
31 in her official capacity as treasurer†

32 Joe Garcia for Congress and Roland Sanchez-
33 Medina in his official capacity as treasurer†

1	Joe Kennedy for Congress and David N. Martin in
2	his official capacity as treasurer†
3	Joe Palumbo for Congress and Keith Buckhout in
4	his official capacity as treasurer
5	John Carney for Congress and Charles J. Durante in
6	his official capacity as treasurer**
7	John Foust for Congress and Sue Boucher in her
8	official capacity as treasurer
9	John Lewis for Congress and Michael Collins in his
10	official capacity as treasurer†
11	John Tierney for Congress and George Atkins in his
12	official capacity as treasurer†
13	Julia Brownley for Congress and Jennifer May in
14	her official capacity as treasurer†
15	Kanuth for Congress and Robert Courtney in his
16	official capacity as treasurer
17	Kaptur for Congress and Thomas Jaffee in his
18	official capacity as treasurer†
19	Karen Bass for Congress and Stephen J. Kaufman
20	in his official capacity as treasurer†
21	Karen Spilka for Congress Committee and Judy
22	Sandra Kalisker in her official capacity as
23	treasurer**
24	Katherine Clark for Congress and Gemma W.
25	Martin in her official capacity as treasurer†
26	Kathleen Rice for Congress and Margaret May in
27	her official capacity as treasurer**
28	Keep Nick Rahall in Congress Committee and
29	Edward Rahall in his official capacity as treasurer†
30	Kelly Westlund for Congress and Larry MacDonald
31	in his official capacity as treasurer
32	Kevin Strouse for Congress and Ronald L Fader in
33	his official capacity as treasurer†

1	Kind for Congress Committee and Brent Smith in
2	his official capacity as treasurer†
3	Kirkpatrick for Arizona and Daniel A. Flores in his
4	official capacity as treasurer†
5	Korpe for Congress and Satish W. Korpe in his
6	official capacity as treasurer†
7	Koutoujian for Congress and Barbara Foley in her
8	official capacity as treasurer
9	Kultala for Congress and Carol Marinovich in her
10	official capacity as treasurer†
11	Kurt Schrader for Congress and Jeff A. Green in his
12	official capacity as treasurer†
13	Kuster for Congress, Inc. and Charles Willing in his
14	official capacity as treasurer†
15	Kyrsten Sinema for Congress and Judith Allen in
16	her official capacity as treasurer†
17	Laferla for Congress and Frances Miller in her
18	official capacity as treasurer†
19	Langevin for Congress and Edward A. Giroux in his
20	official capacity as treasurer†
21	Lara for New Mexico and Jennifer May in her
22	official capacity as treasurer†
23	Larson for Congress and Barry Feldman in his
24	official capacity as treasurer†
25	Laura Fjeld for Congress Committee and Deborah
26	Hylton in her official capacity as treasurer†
27	Lavellee for Congress and Ruth Lavallec in her
28	official capacity as treasurer
29	Lavern Chatman for Congress and Angela Moody
30	in her official capacity as treasurer
31	Lenda Sherrell for Congress and Richard F. Laroche
32	in his official capacity as treasurer†

1 Levin for Congress and Jeremy Mahrle in his
2 official capacity as treasurer

3 Loeb sack for Congress and Ian J. Russell in his
4 official capacity as treasurer[†]

5 Lofgren for Congress and Mark B. Fredkin in his
6 official capacity as treasurer[†]

7 Lois Frankel for Congress and Janica
8 Kyriacopoulos in her official capacity as treasurer[†]

9 Lopez for Congress and Amy Lewis in her official
10 capacity as treasurer[†]

11 Louie Minor for Congress and Anna Vazquez in her
12 official capacity as treasurer

13 Louise Slaughter Re-Election Committee and Nora
14 E. Tuthill in her official capacity as treasurer[†]

15 Lucille Roybal-Allard for Congress and A.
16 Christian Hart in his official capacity as treasurer[†]

17 Maguire for Us and Lisa Sciancalepore in her
18 official capacity as treasurer

19 Malcolm Graham for Congress and Donnie T.
20 Simmons in his official capacity as treasurer[†]

21 Maloney for Congress and Melissa A. Mendez in
22 her official capacity as treasurer

23 Marc Veasey Congressional Campaign Committee
24 and Charles G. Langham, III in his official capacity
25 as treasurer[†]

26 Marcus Brandon for Congress and Cecil Antonio
27 Brockman in his official capacity as treasurer

28 Margie Wakefield for Congress and Doni Mooberry
29 Slough in his official capacity as treasurer[†]

30 Marianne Williamson for Congress and Kevin
31 Heneghan in his official capacity as treasurer

32 Marjorie 2014 and Jennifer May in her official
33 capacity as treasurer[†]

2025 RELEASE UNDER E.O. 14176

1 Mark Levine for Congress Inc. and Samson March
2 in his official capacity as treasurer
3
4 Mark Pocan for Congress and Sondy Pope in her
5 official capacity as treasurer†
6
7 Mark Pryor for U.S. Senate and Bob Edwards in his
8 official capacity as treasurer†
9
10 Mark Takai for Congress and Edward Dion
11 Kaimihana in his official capacity as treasurer†
12
13 Mark Takano for Congress and Jennifer May in her
14 official capacity as treasurer†
15
16 Martin Skelly for Congress and Kelly Skelly in her
17 official capacity as treasurer
18
19 Mary Ellen Balchunis for Congress and Elizabeth
20 A. Parziale in her official capacity as treasurer
21
22 Mary M. Headrick for Congress and Phyllis Brown
23 in her official capacity as treasurer
24
25 Mary Rose Wilcox for Congress and Aaron Kizer in
26 his official capacity as treasurer†
27
28 Matsui for Congress and David K. Murphy in his
29 official capacity as treasurer†
30
31 Matt for Oklahoma and Erica Silverstein in her
32 official capacity as treasurer

1	Mike Honda for Congress and Vicki Day in her
2	official capacity as treasurer†
3	Mike Thompson for Congress and Tom Hannigan
4	in his official capacity as treasurer†
5	Monica Vernon for Congress and Robert Rush in
6	his official capacity as treasurer†
7	Montanans for Lewis and Holly Giarraputo in her
8	official capacity as treasurer
9	Moore for Alaska and Carolyn H. Covington in her
10	official capacity as treasurer
11	Moore for Congress and Ellen Bravo in her official
12	capacity as treasurer
13	Morton for Congress and Linda A. Ward in her
14	official capacity as treasurer
15	Moulton for Congress and Aaron Bartnick in his
16	official capacity as treasurer**
17	Mowrer for Iowa and Dennis Skinner in his official
18	capacity as treasurer
19	Nadler for Congress and Lewis Weissman in his
20	official capacity as treasurer†
21	Nancy Najarian for Congress and Michael Stimson
22	in his official capacity as treasurer
23	Nancy Pelosi for Congress and Steven Swig in his
24	official capacity as treasurer†
25	Natalie Tennant for Senate and Arden J. Curry II in
26	his official capacity as treasurer†
27	Nels Mitchell for Idaho and Susan Eastlake in her
28	official capacity as treasurer
29	Nick Casey for Congress and Martin Glasser in his
30	official capacity as treasurer†
31	Nita Lowey for Congress and Richard Melnikoff in
32	his official capacity as treasurer†

1 Nolan for Congress Volunteer Committee and
2 James A. Dechaine in his official capacity as
3 treasurer†
4 Norm Mosher for Congress and Samantha Carol
5 Van Saun in her official capacity as treasurer†
6 Nunn for Senate and James S. Grign in his official
7 capacity as treasurer†
8 Obama for America and Martin H. Nesbitt in his
9 official capacity as treasurer
10 Obermueller for Congress and Joanne Obermueller
11 in her official capacity as treasurer†
12 O'Brien for Iowa and H. Daniel Holm Jr. in his
13 official capacity as treasurer†
14 Orman for U.S. Senate Inc. and Wynne Royce
15 Jennings in his official capacity as treasurer
16 Pallone for Congress and Warren Goode in his
17 official capacity as treasurer**
18 Pallone for Senate and Peter D. Nichols in his
19 official capacity as treasurer**
20 Pam Byrnes for Congress and Vicki Hopper in her
21 official capacity as treasurer†
22 Parrish for Congress and William F. Schoell in his
23 official capacity as treasurer†
24 Pascrell for Congress and Bernadette McPherson in
25 her official capacity as treasurer†
26 Pat Murphy for Iowa and Vicki Krug in her official
27 capacity as treasurer†
28 Patrick Henry Hays for Congress and Mike Hays in
29 his official capacity as treasurer†
30 Paul Tonko for Congress and Patrick J. Bulgaro in
31 his official capacity as treasurer†
32 Peiser for Congress and Patricia Cratty in her
33 official capacity as treasurer

1	People for Ben and Carmen Lujan in her official
2	capacity as treasurer†
3	People for Derek Kilmer and Jay Petterson in his
4	official capacity as treasurer†
5	People for Rick Weiland and Beverly Casey in her
6	official capacity as treasurer
7	Perlmutter for Congress and Karen J. Rokala in her
8	official capacity as treasurer†
9	Pete Aguilar for Congress and Jennifer May in her
10	official capacity as treasurer†
11	Peter Clemens for Congress and Tammy Clemens
12	in her official capacity as treasurer†
13	Peters for Michigan and Geraldine Buckles in her
14	official capacity as treasurer†
15	Peterson for Congress and Elliott A. Peterson in his
16	official capacity as treasurer
17	Pingree for Congress and Anne Rand in her official
18	capacity as treasurer†
19	Poetter for Congress and Kelly A. Marks in her
20	official capacity as treasurer
21	Quigley for Congress and Erica Kelly in her official
22	capacity as treasurer†
23	Rangel for Congress and David A. Paterson in his
24	official capacity as treasurer†
25	Reed Committee and Elizabeth R. Young in her
26	official capacity as treasurer†
27	Re-Elect McGovern Committee and William T.
28	Talcott in his official capacity as treasurer†
29	Richard Bolger for Congress and James B. Veltri in
30	his official capacity as treasurer
31	Richmond for Congress and Maple Gaines in her
32	official capacity as treasurer†

1 Rick Wade for Senate and G. Hubbard Smalls in his
2 official capacity as treasurer

3 Ringo for Congress - Idaho Congressional District 1
4 and Ron Beitelspacher in his official capacity as
5 treasurer

6 Ritchie for Congress and Abbot Taylor in his
7 official capacity as treasurer**

8 Ro for Congress Inc. and Reena Roa in her official
9 capacity as treasurer**

10 Rob Joswiak for Congress and Zack Byrnes in his
11 official capacity as treasurer

12 Rob Zerban for Congress 2014 and Randy Bryce in
13 his official capacity as treasurer†

14 Robin Kelly for Congress and Ryan Vanmeter in his
15 official capacity as treasurer†

16 Robles for Congress and Silvia Castro in her official
17 capacity as treasurer†

18 Romanoff for Congress and Michael Hamrick in his
19 official capacity as treasurer†

20 Ron Barber for Congress and Laura T. Almquist in
21 her official capacity as treasurer†

22 Ron Leach for Congress Committee and Theresa
23 Drake in her official capacity as treasurer

24 Ruben Hinojosa for Congress and Vickie
25 Winpisinger in her official capacity as treasurer†

26 Rudy Hobbs for Congress and Brandon Asberry in
27 his official capacity as treasurer

28 Rush Holt for Senate and Robert J. Del Tufo in his
29 official capacity as treasurer†

30 Russ for Congress and Carol S. Warner in her
31 official capacity as treasurer

32 Sanford Bishop for Congress and Evelyn Turner
33 Pugh in her official capacity as treasurer†

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1	Schatz for Senate and Keith Amemiya in his official
2	capacity as treasurer†
3	Schertzing for Congress and Mary Ruttan in her
4	official capacity as treasurer†
5	Schiff for Congress and Stephen Kaufman in his
6	official capacity as treasurer†
7	Schneider for Congress and Mark A. Levy in his
8	official capacity as treasurer†
9	Schwartz for Congress and Daniel Ciccariello in his
10	official capacity as treasurer
11	Scott Brion for Congress and Eric J. Loudenslager
12	in his official capacity as treasurer
13	Scott for Congress and Sean M. Williamson in his
14	official capacity as treasurer
15	Scott Peters for Congress and Nicholas R. Femia in
16	his official capacity as treasurer**
17	Sean Eldridge for Congress and Michael Oates in
18	his official capacity as treasurer†
19	Sean Patrick Maloney for Congress and Holly
20	Giarraputo in her official capacity as treasurer†
21	Shaheen for Senate and Kathleen H. Goode in her
22	official capacity as treasurer†
23	Sharon Sund for Congress and Eugene Roberson in
24	his official capacity as treasurer
25	Sheila Oliver for US Senate and Jennie Oliver in
26	her official capacity as treasurer
27	Sherman for Congress and Stephen J. Kaufman in
28	his official capacity as treasurer†
29	Sherzan for Iowa and Susan Sherzan in her official
30	capacity as treasurer
31	Sinner for Congress and Jon Ewen in his official
32	capacity as treasurer†

1 Skinner for Congress '14 and Charles Joseph
2 Skinner in his official capacity as treasurer

3 Sona Mehring for Congress and Shawn Hunter in
4 his official capacity as treasurer

5 Stallings for Idaho and Cary Jones in his official
6 capacity as treasurer

7 Stanley Chang for Congress and Nathian Okubo in
8 his official capacity as treasurer

9 Stephen Lynch for Congress and Brian Miller in his
10 official capacity as treasurer

11 Stephen Lynch for Senate and Brian Miller in his
12 official capacity as treasurer†

13 Steve Cohen for Congress and Henry M. Turley in
14 his official capacity as treasurer†

15 Steve Israel for Congress Committee and Harris
16 Wiener in his official capacity as treasurer†

17 Stocker in Congress and Chuck Banks in his official
18 capacity as treasurer

19 Supporters of Shayan for Congress and Shayan H.
20 Modarres in his official capacity as treasurer

21 Susan Grettenberger for Congress and Isaac
22 Francisco in his official capacity as treasurer

23 Suzanne Patrick for Congress and Suzanne Patrick
24 in her official capacity as treasurer†

25 Swalwell for Congress and Shannon Fuller in her
26 official capacity as treasurer†

27 Swati Dandekar for Congress and Dennis J.
28 Naughton in his official capacity as treasurer†

29 Taylor for US Senate and Victor Russell Petty III in
30 his official capacity as treasurer

31 Ted Deutch for Congress Committee and Jeffrey
32 Weinstock in his official capacity as treasurer†

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1 Terri Sewell for Congress and Edward A. Hosp in
2 his official capacity as treasurer[†]

3 Texans for Henry Cuellar Congressional Campaign
4 and Rosendo Carranco in his official capacity as
5 treasurer[†]

6 The Bill Keating Committee and David A. Doucette
7 in his official capacity as treasurer

8 The Markey Committee and Marie C. Carbone in
9 her official capacity as treasurer[†]

10 The Niki Tsongas Committee and Zoila Gomez in
11 her official capacity as treasurer

12 Tim Bishop for Congress and Molly Bishop in her
13 official capacity as treasurer[†]

14 Tim Ryan for Congress and Allen Ryan in his
15 official capacity as treasurer[†]

16 Tim Walz for US Congress and Gerald Maschka in
17 his official capacity as treasurer[†]

18 Titus for Congress and Jennifer May in her official
19 capacity as treasurer[†]

20 Toi for Illinois and Susan Jenkins in her official
21 capacity as treasurer

22 Tony Cardenas for Congress and David Gould in
23 his official capacity as treasurer

24 Trammell for Congress and David J. Irving in his
25 official capacity as treasurer

26 Trivedi for Congress and Bret Binder in his official
27 capacity as treasurer

28 Troy Jackson for Congress and Alan Lindquist in
29 his official capacity as treasurer

30 Tulsi for Hawai'i and Talia Tamayo Khurana in her
31 official capacity as treasurer[†]

32 Udall for Colorado and Ellen Marshall in her
33 official capacity as treasurer[†]

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1 Udall for Us All and Carolyn Gonzales in her
2 official capacity as treasurer†
3
4 Van Hollen for Congress and Stacey Maud in her
5 official capacity as treasurer†
6
7 Vanderstelt for Congress and Deanna Taylor in her
8 official capacity as treasurer†
9
10 Vincent Gregory for Congress and Harold M.
11 Montgomery in his official capacity as treasurer
12
13 Visclosky for Congress and Michael Malczewski in
14 his official capacity as treasurer
15
16 Walrond for Congress and Torian J. Robinson in his
17 official capacity as treasurer†
18
19 Walsh for Montana and Holly Giarraputo in her
20 official capacity as treasurer
21
22 Welch for Congress and John C. Candon in his
23 official capacity as treasurer†
24
25 Weldon Russell for Congress Campaign Committee
26 and Bridget Herbert in her official capacity as
27 treasurer
28
29 Wendy Greuel for Congress and Stephen J.
30 Kaufman in his official capacity as treasurer†
31
32 Wes Neuman for Congress and Linda Neuman in
33 her official capacity as treasurer
34
35 Will Brownsberger for Congress and David Merfeld
36 in his official capacity as treasurer
37
38 Yarmuth for Congress and Sarah J. Martin in her
39 official capacity as treasurer†

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